

APPENDIX

Appendix A

No.	Bates	Multiple Clawbacks ¹	Code-Named Project	From	To	CC	Privilege Log Description	Privilege Assertion ²
1	GOOG-DOJ-12766025	X	X	[REDACTED]	[REDACTED]	NA	Email demonstrating legal advice of counsel regarding regulatory issues.	AC
2	GOOG-DOJ-15231660			[REDACTED]	NA	NA	Draft notes seeking legal advice of counsel regarding regulatory issues.	AC
3*	GOOG-DOJ-AT-00029680			[REDACTED]	NA	NA	Draft document containing legal advice of [REDACTED] ESQ regarding contract terms.	AC
4**	GOOG-DOJ-AT-01019463			[REDACTED]	[REDACTED]	NA	Email seeking and containing legal advice of Ted Lazarus ESQ regarding regulatory issues.	AC
5	GOOG-DOJ-AT-01106088		X	[REDACTED]	NA	NA	Information compiled in order to ballpark the financial cost of a potential remedy in response to active government investigations, prepared at the direction of Ted Lazarus, ESQ and in anticipation of litigation. The compiled information, which did not exist in the ordinary course of business and would not have been compiled but for the active government investigations and anticipated litigation, reflects the opinion work product of Ted Lazarus, ESQ and [REDACTED] ESQ because it reveals legal strategy and the nature of the remedy.	WP

* Indicates Google partially withdrew its privilege assertions on June 2, 2023.

** Indicates Google withdrew in full its privilege assertions on June 2, 2023.

¹ All of the documents in the Appendix have been clawed back at least once.

² “AC” indicates attorney-client privilege. “WP” indicates work product.

No.	Bates	Multiple Clawbacks ¹	Code-Named Project	From	To	CC	Privilege Log Description	Privilege Assertion ²
6	GOOG-DOJ-AT-01106174		X	[REDACTED]	NA	NA	Document and draft correspondence seeking and reflecting legal advice and opinion work product of Ted Lazarus ESQ regarding potential remedy in response to active government investigations, prepared in anticipation of litigation.	AC, WP
7*	GOOG-DOJ-AT-01139556			[REDACTED]	NA	NA	Presentation seeking and revealing legal advice of [REDACTED] ESQ regarding legal aspects of product development.	AC
8	GOOG-DOJ-AT-01498627		X	[REDACTED]	[REDACTED]	[REDACTED]	Email gathering information to assess cost of proposed remedy to resolve active government investigations, undertaken in anticipation of litigation. This email reveals the underlying legal strategy and opinion work product of Ted Lazarus, ESQ and [REDACTED], ESQ in that it reveals the nature of the remedy being assessed.	WP
9	GOOG-DOJ-AT-01514569		X	google docs <comments-noreply@docs.google.com>	[REDACTED]	NA	Email discussing potential remedy and reflecting opinion work product of counsel in response to an active government investigation by the French Competition Authority and in anticipation of litigation.	AC, WP
10	GOOG-DOJ-AT-01692081			<comments-noreply@docs.google.com>	[REDACTED]	NA	Email seeking and containing legal advice of Ted Lazarus ESQ regarding compliance with competition laws.	AC
11	GOOG-DOJ-AT-01887780		X	[REDACTED]	[REDACTED]	[REDACTED]	Email chain regarding potential remedy in response to active government investigations and in anticipation of litigation, reflecting opinion work product of Kent Walker ESQ and Ted Lazarus ESQ, prepared in anticipation of litigation.	AC, WP

No.	Bates	Multiple Clawbacks ¹	Code-Named Project	From	To	CC	Privilege Log Description	Privilege Assertion ²
12	GOOG-DOJ-AT-01895607		X	<comments-noreply@docs.google.com>	[REDACTED]	NA	Email reflecting comments on draft presentation regarding remedy to resolve active government investigations, undertaken at the direction of Ted Lazarus, ESQ and in anticipation of litigation. This email reveals opinion work product of Ted Lazarus, ESQ and [REDACTED], ESQ in that it reveals legal strategy and the nature of the remedy, which would not have been considered but for the existence of active government investigations and anticipated litigation.	WP
13	GOOG-DOJ-AT-01914586		X	[REDACTED]	NA	NA	Document revealing legal advice of counsel regarding settlement negotiation with FCA.	AC
14	GOOG-DOJ-AT-02099758		X	[REDACTED]	NA	NA	Presentation reflecting and containing opinion work product of and reflecting legal strategy and advice of Ted Lazarus ESQ and [REDACTED] ESQ regarding potential remedies to resolve active government investigations, prepared in anticipation of litigation.	AC; WP
15*	GOOG-DOJ-AT-00660900	X	X	[REDACTED]	[REDACTED]	NA	Email reflecting remedy project undertaken in response to active government investigations and in anticipation of litigation.	AC, WP

No.	Bates	Multiple Clawbacks ¹	Code-Named Project	From	To	CC	Privilege Log Description	Privilege Assertion ²
16	GOOG-DOJ-AT-00205841			[REDACTED]	[REDACTED]	NA	Email revealing legal advice and opinion work product of competition counsel and project undertaken in anticipation of litigation, in response to active government investigations.	AC, WP
17	GOOG-DOJ-AT-00030150	X	X	[REDACTED]	NA	NA	Employee performance evaluation reflecting remedy projects undertaken in response to active government investigations and in anticipation of litigation.	WP
18*	GOOG-DOJ-AT-00660895	X	X	[REDACTED]	[REDACTED]	NA	Email reflecting remedy project undertaken in response to active government investigations and in anticipation of litigation.	AC, WP
19	GOOG-DOJ-AT-01007207	X	X	[REDACTED]	[REDACTED]	[REDACTED]	Portions of email revealing advice of competition counsel and project undertaken in anticipation of litigation, in response to active government investigations.	AC, WP
20	GOOG-DOJ-AT-01687296	X	X	[REDACTED]	[REDACTED]	NA	Email revealing legal advice of counsel regarding legal aspects of product development.	AC

No.	Bates	Multiple Clawbacks ¹	Code- Named Project	From	To	CC	Privilege Log Description	Privilege Assertion ²
21**	GOOG-DOJ- 06588656	X					Email discussion revealing legal advice of counsel regarding product development.	AC